

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PROJECT VERITAS and PROJECT
VERITAS ACTION FUND, : Civil Action No. 7:23-cv-04533
:
Plaintiffs, :
:
-against- :
:
JAMES O'KEEFE, TRANSPARENCY 1, :
LLC d/b/a O'KEEFE MEDIA GROUP, RC :
MAXWELL, and ANTHONY :
IATROPOULOS, :
:
Defendants. :
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MOTION FOR ADMISSION *PRO HAC VICE* OF MARC J. RANDAZZA

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, Marc J. Randazza, hereby move this Court for an Order for admission to practice *Pro Hac Vice* to appear as counsel for Plaintiffs Project Veritas and Project Veritas Action Fund in the above-captioned action. In the past 3 years, I sought *pro hac vice* admission in this Court in the following matters:

On August 3, 2021, I was admitted *Pro Hac Vice* in the United States District Court for the Southern District of New York in the matter of *Maud Maron v. The Legal Aid Society, et. al.*, Case No.: 1:21-cv-05960-KPF.

On October 5, 2021, I was admitted *Pro Hac Vice* in the United States District Court for the Southern District of New York in the matter of *Logan Cheng v. Wengui Guo*, Case No.: 1:20-cv-05678-KPF.

On April 18, 2023, I was admitted *Pro Hac Vice* in the United States District Court for the Southern District of New York in the matter of *MCM Group 22, LLC v. Lyndon Perry*, Case No.: 1:22-cv-06157-PGG.

I am a member in good standing of the Bars of the states of Arizona, California, Florida, Massachusetts, and Nevada, and there are no pending disciplinary proceedings against me in any state or federal court, although, as set forth in the attached, a matter is disclosed out of an abundance of caution. I have never been convicted of a felony. I have been disciplined as detailed herein. I have attached the affidavit pursuant to Local Rule 1.3.

Dated: November 7, 2023.

Respectfully Submitted,

/s/ Marc J. Randazza
Marc J. Randazza, Esq.
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Civil Action No. 7:23-cv-04533

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 7, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/ECF.

Respectfully Submitted,

/s/ Marc J. Randazza
Marc J. Randazza